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March 2, 2021

VIA ECF ELECTRONIC FILING

Hon. Paul A. Engelmayer, U.S.D.J.
Southern District of New York
40 Foley Square, Courtroom 1305
New York, NY 10007

**Re: Building Service 32BJ Health Fund, et al. v. Vanguard General Services Corp.
Civil Action No. 20-cv-5608**

Dear Judge Engelmayer:

Our firm is counsel for the respective Building Service 32BJ Benefit Funds (the "Funds"), the Plaintiffs in this matter. Presently, the parties are required to, by March 3, 2022, submit a Case Management Plan to Your Honor. The parties ask that this deadline be extended two (2) weeks, to March 17, 2022. Additionally, presently Defendant Vanguard General Services Corp.'s deadline to file an Answer to the Complaint is March 7, 2022. Consistent with the below, the parties ask that this deadline be extended to sometime on or after March 17, 2022.

Today, counsel for the parties met at length, and there does appear to be hope that the parties may yet settle this matter. Generally speaking, there appears to be a consensus about the general terms of a settlement agreement. However, the general terms discussed at the meeting today need to be reviewed with our clients, and if approved a settlement agreement will need to be drafted and negotiated. Consequently, the parties ask for additional time to file a proposed Plan. Should the parties not settle, we propose to file a Case Management Plan by March 17, 2022, containing the deadlines set forth in Your Honor's Order of March 1, 2022. See ECF Document No. 46.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact me.


Respectfully submitted,

/s/ Samuel R. Bloom

Samuel R. Bloom

cc: Walter M. Foster, Esq. (via electronic mail)

Granted. However, no further extensions will be granted absent extraordinary causes. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

Dated: March 3, 2022